

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

*In re J.P. Morgan Stable Value Fund ERISA
Litigation*

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Master File No. 12-cv-2548-VSB

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS
SETTLEMENT, APPROVAL OF NOTICES OF SETTLEMENT, APPROVAL OF THE
PLAN OF ALLOCATION, AND SETTING OF FAIRNESS HEARING**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the Declaration of Co-Lead Class Counsel, Settling Plaintiffs, by Co-Lead Class Counsel, hereby move the Court, to set a date for a Preliminary Approval Hearing and for entry of an Order: (a) granting preliminary approval of the Settlement;¹ (b) approving the forms for the mailing and publication of the notice of Settlement; (c) granting preliminary approval of the proposed Plan of Allocation; and (d) setting a date and time for the Fairness Hearing with respect to the Settlement and related deadlines as set forth in the proposed Preliminary Approval Order, attached as Exhibit 1 to the Settlement Agreement, dated November 3, 2017, filed herewith. This motion is unopposed by Defendants.²

WHEREFORE, for the reasons stated and such other reasons as may appear to the Court, Plaintiffs respectfully request that the Court grant the instant motion.

¹ Unless otherwise defined, all capitalized terms have the meanings ascribed to them in the Settlement Agreement filed herewith.

² Plaintiffs Nancy Dye, John Stolwyk, Clay Hedges, and Rosemary Dotson, who are represented by Phillip G. Greenfield, previously informed the Court they would be objecting to the proposed Settlement. (Doc. 391).

Respectfully submitted,

/s/ Michael M. Mulder

Dated: November 3, 2017

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CERTIFICATE OF SERVICE

I certify that on November 3, 2017, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notification of such filing to the parties participating in the Court's electronic filing system.

/s/ Michael M. Mulder
Michael M. Mulder